

1
2
3
4
5
6
7
8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF WASHINGTON

10 IN RE:

11 Easterday Ranches, Inc. and Easterday Farms,
12 a Washington general partnership,

13 Debtors.

Chapter 11

Case No. 21-00141-WLH11 and
Case No. 21-00176-WLH11

14
15 **AGREED ORDER ON MOTION FOR**
16 **RELIEF FROM AUTOMATIC STAY**

17 Based upon the agreement of Santander Consumer USA Inc. dba Chrysler Capital, its
18 assignees and/or successors (“Creditor”), and debtor Easterday Farms, a Washington general
19 Partnership (“Debtor”), by and through its respective counsel, it is hereby ORDERED as
20 follows:

- 21 1. This order affects the following two vehicles: (1) 2018 Ram 3500
22 VIN: 3C63R3AL4JG277090, and (2) 2018 Ram 3500 VIN: 3C63R3ALXJG374391
23 (collectively, the “Vehicles” and each, a “Vehicle”). The parties have stipulated to the terms
24 of this order, which are non-modifiable without the parties’ written consent.
25 2. Debtor shall remit to Creditor the sum of \$60,000.00 (the “Funds”) (\$30,000.00 for each of
26 the Vehicles) in full and complete satisfaction of Creditor’s claim(s) for each Vehicle.
27 3. Within fourteen (14) calendar days after the Funds are received by Creditor, Creditor shall
28 release and send titles for both Vehicles to Debtor’s counsel or such other address indicated
29 by Debtor’s counsel.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28
- 29
4. Upon Creditor's receipt of the Funds, Claim Nos. 30 and 87 (Case No. 21-00176-WLH11) and Claim No. 34 (Case No. 21-00141-WLH11) shall be deemed withdrawn with prejudice in every respect, and Creditor shall be deemed to have fully and forever released, waived, and discharged any and all claims, interests, obligations, rights, suits, damages, causes of action, remedies, and liabilities whatsoever, asserted or assertable by or on behalf of Creditor, whether known or unknown, foreseen or unforeseen, existing or hereafter arising, in state or federal law, equity, or otherwise, against the Debtors and their respective officers, directors, managers, members, employees, investors, principals, representatives, and affiliates, arising from, related to, or in connection with the Debtors (whether prepetition or postpetition).
 5. Creditor shall have no deficiency claim(s) against the Debtors, the Debtors' estates, or any other third party in relation to the Vehicles.
 6. Payment shall be made directly to Santander Consumer USA Inc. dba Chrysler Capital, 5201 Rufe Snow Drive, Ste. 400, North Richland Hills, TX 76180, or as otherwise agreed on by the parties.
 7. The fourteen (14) day stay provided in Fed. R. Bankr. P. 4001(a)(3) is waived, and the terms and conditions of this order shall be immediately effective and enforceable upon its entry.
 8. The court shall retain jurisdiction and power to hear and determine all matters arising from or related to the implementation of this order.

/// END OF ORDER ///

Submitted by:

MCCARTHY & HOLTHUS, LLP

/s/ Lance E. Olsen

Lance E. Olsen, WSBA# 25130
Attorney for Creditor

Stipulated by:

BUSH KORNFELD LLP

1
2 */s/ Thomas A. Buford*
3 Thomas A. Buford, WSBA# 52969
4 Richard B. Keeton, WSBA# 51537
5 Attorneys for Debtors
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29